

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MICHELE COELLA and DENISE DUSSAULT,

Plaintiffs,

v.

04-cv-2710 (LAP)

THE REPUBLIC OF ARGENTINA,

Defendant.

MARCELO RUBEN RIGUIERO, et al.,

Plaintiffs,

v.

05-cv-3089 (LAP)

THE REPUBLIC OF ARGENTINA,

Defendant.

ANTONIO FORGIONE, et al,

Plaintiffs,

v.

06-cv-15171 (LAP)

THE REPUBLIC OF ARGENTINA,

Defendant.

**NOTICE OF MOTION TO DISMISS PLAINTIFFS' CLAIMS AND VACATE
PLAINTIFFS' JUDGMENTS**

PLEASE TAKE NOTICE that, upon the Declaration of Rathna J. Ramamurthi, dated September 6, 2019 and all attached exhibits; and the accompanying Memorandum of Law, defendant the Republic of Argentina will move this Court at a date and time to be determined by the Court, pursuant to the Court's inherent authority and Federal Rules of Civil Procedure 60 and

41, for an order dismissing Plaintiffs' claims with prejudice and vacating Plaintiffs' judgments, and for such other and further relief as this Court deems just and proper.

Dated: New York, New York
September 6, 2019

CLEARY GOTTLIEB STEEN & HAMILTON
LLP

By: 
Carmine D. Boccuzzi, Jr.
(cboccuzzi@cgsh.com)
Rahul Mukhi (rmukhi@cgsh.com)
One Liberty Plaza, New York,
New York 10006
(212) 225-2000

Attorneys for the Republic of Argentina

TO: Michael Champlin Spencer
Milberg Phillips Grossman LLP
One Pennsylvania Plaza
New York, New York 10119

Jessica June Sleater
Anderson Sleater LLC
1345 Avenue of The Americas
New York, New York 10105

Attorneys for Plaintiffs